



## Information on Data Protection

Welcome and thank you for your interest in our company!

As you may read in our [privacy policy](#), we are committed to your rights for privacy, data protection and self-control of personal data. All our offers are addressing entrepreneurs only.

Taking this into account, herewith we would like to inform you about the following in order to comply with our obligation to inform according article 13 GDPR:

### Who are we?

icomod UG (haftungsbeschränkt) & Co.KG

Represented by: icomod UG (haftungsbeschränkt), CEO: Dr.-Ing. Burkhard Munker  
Olper Strasse 53  
DE-57258 Freudenberg  
Germany

Email: [privacy@icomod.com](mailto:privacy@icomod.com) (with respect to privacy-related questions)

### Who is responsible for data protection on our side?

Everybody on our side is responsible for data protection. Due to our current company size we do not yet need to assign a separate data security officer. Therefore, the main responsibility for all matters related to data protection is at the CEO.

### We acquire data about you. Which ones? How long? And are we allowed to do so?

Find an overview on answers to these questions in the following:

#### Data Categories

- Basic personal data (e.g. first name, last name, contact details)
- Information about your company (e.g. legal address, website)
- In case you gave us your business card, we store all data contained on this business card.
- Documentation data (e.g. meeting minutes, phone messages)
- Your correspondence with us incl. all contained information (e.g. emails)
- Email tracking information (e.g. kontakt-ID, email-address, status, bounce-status, time of registration, IP-address of registration, time of confirmation, IP-address of confirmation, time of de-registration, IP-address of de-registration, referrer)
- SMS tracking information (e.g. mobile number, message, status, bounce-status, time of registration, time of de-registration)



- Data concerning proposals, assignments and ordering processes
- Optionally, during our online-trainings and webinars we regularly load tagging-pixel of our Email-service provider Klick-Tipp. This allows us to detect, if and until when you attend the event for which you had registered. Based on this information we may also during the webinar remind you by email or SMS to re-enter the online-event.
- Supplementary publically available information (e.g. from social networks)
- Sales supporting data (e.g. about technologies/products/services that are potentially interesting for you, tagging-information)
- Other data for entering and executions of our business relationship

## Sources

We receive these information in context of our business relationship with you, e.g. from your business card that you handed over when you gave us your consent; your request of the newsletter or other retrievable information; registration to an online- or offline event; from a survey; from public sources; references from commissioning partners etc.

## Purposes and Legal basis

1. Consent to the processing (...) for one or more specific purposes; – Article 6 (1) lit. a GDPR: Your explicit consent is the legal basis for data processing e.g. when requesting newsletters, requesting other retrievable information or surveys on websites and by email.
2. Performance of a contract (...) or (...) prior to entering into a contract – Article 6 (1) lit. b GDPR: The purpose of data processing depends on the precise business relationship or the precise assignment by you.
3. Legitimate interests pursued by the controller or by a third party – Article 6 (1) lit. f GDPR: This applies referring the goal stated in our [privacy policy](#) e.g. for general business control, external representation, requirements analysis and optimization of our portfolio of – partly also representing third parties – products and services, entering and maintaining of cooperations, data transfer between us and commissioning partners or the assurance of IT-security of our company.

## Duration of storage

- In case of your consent in context of the double-opt-in-procedure we store these data until revocation of your consent.
- Data that we require to fulfill a contract is stored until end of the retention period, usually 3 years after end of the contract relationship.
- Excluded from the previous cases are data, that must not be deleted due to legal obligations of the responsible party (e.g. fiscal retention obligations).



## What do you have to know for your retention?

As far as during your registration you gave us your consent to process your data, we refer you to the following:

You may revoke your consent at any time by informal notice to one of the contact channels stated above (see section „Who are we?“). The data processed before we receive your request may still be legally processed.

## What do you have to know about our tags?

We are applying the tagging-technology of our service provider [Klick-Tipp](#). This enables us e.g to determine, if a newsletter-message has been opened and, if applicable, which links have been clicked. Further information about this functionality can be found here (in German):

<https://icomod.com/klick-tipp-handbuch>. Contractual decisions are not based on this.

## **Are we obligated to acquire these data? What happens, if we don't acquire these data?**

No legal obligation does exist to acquire these data. However the possibility does exist that missing of some or all data may occasionally lead to inquiries or make the establishment and maintaining of a business relationship harder or impossible.

## **To whom do we transfer the data? And: Do the data leave the European Union (EU) or the European Economic Area (EEA)?**

We transfer our data to external service providers who support us in the following activities: Storage and management of data, IT-support, execution of events (incl. webinars), assignment and evaluation of tags.

In doing so we assure that these service providers are carefully selected, contracted in a data protection compliant way and are checked regularly. Some of these service providers are companies who process their data or have their place of business outside of the EEA. Among these companies we only select companies that process the data at locations for which an adequacy decision of the commission (article 45 GDPR) exists. If this requirement is not fulfilled, we contract such service providers only, if they can provide appropriate safeguards (article 46 GDPR), e.g. by agreement of the EU-standard contract clauses.

## **What are your rights?**

You have several rights. You have the right to be provided with information about any of your personal data as well as for correction or deletion, on restricting the processing, on objection to processing and on data portability. Furthermore you have the right to file complaints with the competent regulatory authorities. Politely we want to point out, that these rights may be bound to certain conditions, whose application we will demand.



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Note: The translated text above is provided to you for convenience reasons. Only the [German version](#) is the legally binding reference.